

# **Exhibit 1**

Golden Boy Promotions, LLC v.  
Alan Haymon, Case No. 2:15-cv-  
03378-JFW-MRW (C.D. Cal. Jan.  
6, 2017), ECF No. 322-13

# Exhibit 2

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

GOLDEN BOY PROMOTIONS, LLC,  
GOLDEN BOY PROMOTIONS, INC.  
And BERNARD HOPKINS,

Plaintiffs,

v.

ALAN HAYMON, ALAN HAYMON  
DEVELOPMENT, INC., HAYMON  
HOLDINGS, LLC, HAYMON  
SPORTS, LLC, HAYMON BOXING  
MANAGEMENT, HAYMON  
BOXING LLC, and RYAN  
CALDWELL,

Defendants.

Case 2:15-cv-03378 JFW (MRWx)

Expert Report of  
Gene Deetz, CPA/ABV, ASA, CFF  
September 6, 2016



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EXHIBIT 2

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Expert Report of Gene Deetz, September 6, 2016

35. In Exhibits 1 and 3, I present my period-over-period analyses from 2014 through June 30, 2016, including the TV revenues and related events, as well as the boxers in these events, noting boxers of championship caliber. The analyses summarized in this exhibit show declines in Golden Boy's TV revenue, total revenue, and income from boxing operations, consistent with the anticompetitive impact of Haymon's business practices.<sup>19</sup>
36. In Appendix V, I have done a separate analysis of Golden Boy's contracts with broadcast networks. That analysis reveals that as Haymon began signing contracts with network broadcasters, Golden Boy's network contracts were not renewed on terms previously acceptable to the networks.<sup>20</sup>
37. The continuous and dramatic decline of Golden Boy's on-air events and revenues is occurring at the same time as Haymon enters into the aforementioned exclusivity clauses and makes the related cash payments to the various broadcast networks. *See* Exhibit 1 and Appendix IV.
38. The number of broadcast events and their associated revenues declined in 2015 and 2016, when compared to 2014, as presented in Exhibit 1. As I stated above, the relationship between Golden Boy and the broadcast media (HBO, Showtime, FOX, among others), and Golden Boy's ability to promote successful events requires, among other things, championship caliber boxers<sup>21</sup> and network timeslot availability.<sup>22</sup>
39. Appendices IV and V reflect both the Haymon and Golden Boy media contracts during 2014, 2015, and through June 30, 2016. These appendices demonstrate both the decrease in Golden Boy's access to broadcast media for potential promotion of championship caliber events and the results of Haymon's significant investment in network and cable broadcast timeslots.
40. Consistent with the decline in TV Revenue is a decline in both the number of championship caliber boxing events and the number of Golden Boy promoted championship caliber boxers. *See* Exhibit 1.

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<sup>19</sup> *See* ¶13

<sup>20</sup> *See* Appendices IV and V.

<sup>21</sup> As defined in the Kneuper Report, the base criteria for championship caliber boxers are those with a US based manager or promoter, as well as a television appearance within the preceding eighteen months and a current period top ten ranking in any of the fourteen weight classes, additionally including any former televised world champions within the last eighteen months.

<sup>22</sup> The Shaw Report at pages 5 and 10 describes the promoters' requirement for both product and platform.

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**EXHIBIT 3**  
**Analysis of Revenues and Expenses on an Event-by-Event, Boxer-by-Boxer Basis**

<b>2014 Metrics</b>	<b>TV Revenue</b>	<b>Ticket Sales</b>	<b>Merchandise Royalty</b>	<b>Sponsorship Revenue</b>	<b>Co-Promotion Revenue Share</b>	<b>Other Revenue</b>	<b>Total Revenue</b>	<b>Fighter COGS</b>	<b>Other Expenses</b>	<b>Income from Boxing Operations</b>
Not under contract - championship caliber	18,540,738	8,468,935	17,506	865,028		587,880	28,480,088	16,650,987	9,334,761	2,444,340
Not under contract - not championship caliber	46,182,928	20,833,965	57,319	2,039,902		894,340	70,008,454	46,133,051	22,000,313	1,875,089
Under contract - championship caliber	28,972,751	8,582,634	16,413	855,513		211,525	38,638,836	24,827,789	9,383,695	4,427,352
Under contract - not championship caliber	2,387,256	254,667	306	636,220		42,951	3,321,409	1,732,290	1,556,056	33,063
<b>Total 2014</b>	<b>96,083,673</b>	<b>38,140,201</b>	<b>91,545</b>	<b>4,396,672</b>	<b>-</b>	<b>1,736,696</b>	<b>140,448,787</b>	<b>89,344,118</b>	<b>42,274,826</b>	<b>8,829,843</b>

<b>2015 Metrics</b>	<b>TV Revenue</b>	<b>Ticket Sales</b>	<b>Merchandise Royalty</b>	<b>Sponsorship Revenue</b>	<b>Co-Promotion Revenue Share</b>	<b>Other Revenue</b>	<b>Total Revenue</b>	<b>Fighter COGS</b>	<b>Other Expenses</b>	<b>Income from Boxing Operations</b>
Not under contract - championship caliber	1,155,832	-	-	-	-	(786,014)	369,819	46,580	5,432	117,807
Not under contract - not championship caliber	2,070,179	1,286,869	2,179	770,673	25,200	139,584	4,294,684	2,896,388	1,872,290	(473,994)
Under contract - championship caliber	23,067,055	11,208,612	70,743	1,475,715	1,973,547	1,520,128	39,315,798	24,723,222	9,221,395	5,371,180
Under contract - not championship caliber	1,122,510	426,882	361	782,595	12,748	(1,557)	2,343,540	1,197,983	1,669,363	(523,806)
<b>Total 2015</b>	<b>27,415,576</b>	<b>12,922,363</b>	<b>73,282</b>	<b>3,028,983</b>	<b>2,011,495</b>	<b>872,140</b>	<b>46,323,840</b>	<b>28,864,172</b>	<b>12,768,480</b>	<b>4,691,187</b>

<b>2016 Metrics</b>	<b>TV Revenue</b>	<b>Ticket Sales</b>	<b>Merchandise Royalty</b>	<b>Sponsorship Revenue</b>	<b>Co-Promotion Revenue Share</b>	<b>Other Revenue</b>	<b>Total Revenue</b>	<b>Fighter COGS</b>	<b>Other Expenses</b>	<b>Income from Boxing Operations</b>
Not under contract - championship caliber	2,552,411	927,047	6,508	150,363	-	-	3,636,328	2,050,000	1,211,661	374,667
Not under contract - not championship caliber	600,787	391,362	1,676	361,218	-	-	1,355,042	902,135	788,244	(335,337)
Under contract - championship caliber	19,000,689	6,664,961	49,762	1,214,355	-	-	26,929,767	14,711,458	9,087,663	3,130,645
Under contract - not championship caliber	191,508	230,493	1,115	260,064	-	-	683,181	542,630	510,097	(369,347)
<b>Total 2016</b>	<b>22,345,395</b>	<b>8,213,863</b>	<b>59,260</b>	<b>1,986,000</b>	<b>-</b>	<b>-</b>	<b>32,604,518</b>	<b>18,206,224</b>	<b>11,597,665</b>	<b>2,800,629</b>

**Sources:**

GBP008103  
GBP008105  
GBP008107  
GBP016225  
GBP016257  
GBP016300  
Rankings from <http://www.ibfusbaregistration.com/>  
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**EXHIBIT B**

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